

*September 07, 2022*

Nathan Ochsner, Clerk of Court

**Sealed**

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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**UNITED STATES OF AMERICA**

**vs.**

**RANDY FARREL KELLY  
AARON DAVID ARAUJO  
CHRISTOPHER JAMAIL PITRE  
JAMES ALLEN BYRD  
ALLEN RAY SNODGRASS  
RACHEAL NICOLE SPEARS  
DAVID DEWAYNE GOUGE  
JASON KEITH DAVIS**

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**CRIMINAL NO.**

**4:22-cr-442**

**UNDER SEAL**

**CRIMINAL INDICTMENT**

**THE GRAND JURY CHARGES THAT:**

**COUNT ONE**

**Conspiracy to Possess with the Intent to Distribute a Controlled Substance**

From on or about September 20, 2020, through July 2, 2021, in the Southern District of  
Texas, and elsewhere,

**RANDY FARREL KELLY,  
AARON DAVID ARAUJO,  
CHRISTOPHER JAMAIL PITRE,  
JAMES ALLEN BYRD,  
ALLEN RAY SNODGRASS,  
RACHEAL NICOLE SPEARS,  
DAVID DEWAYNE GOUGE,  
JASON KEITH DAVIS,**

defendants herein, did unlawfully, knowingly, and intentionally, combine, conspire, confederate, and agree with each other and others, known and unknown to the Grand Jury, to possess with the intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), 841(b)(1)(A).

**COUNT TWO**

**Possession with Intent to Distribute a Controlled Substance**

On or about September 20, 2020, in the Southern District of Texas, and elsewhere

**RANDY FARREL KELLY,  
JAMES ALLEN BYRD,**

defendants herein, aided and abetted by others known and unknown to the Grand Jury, did knowingly and unlawfully possess with the intent to distribute a controlled substance. This violation involved 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) and Title 18, United States Code, Section 2.

**COUNT THREE**

**Possession with Intent to Distribute a Controlled Substance**

On or about March 5, 2021, in the Southern District of Texas, and elsewhere

**RANDY FARREL KELLY,  
ALLEN RAY SNODGRASS,**

defendants herein, aided and abetted by others known and unknown to the Grand Jury, did knowingly and unlawfully possess with the intent to distribute a controlled substance. This violation involved 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) and Title 18, United States Code, Section 2.

#### **COUNT FOUR**

##### **Possession with Intent to Distribute a Controlled Substance**

On or about March 8, 2021, in the Southern District of Texas, and elsewhere

**RANDY FARREL KELLY,  
RACHAEL NICOLE SPEARS,**

defendants herein, aided and abetted by others known and unknown to the Grand Jury, did knowingly and unlawfully possess with the intent to distribute a controlled substance. This violation involved 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) and Title 18, United States Code, Section 2.

#### **COUNT FIVE**

##### **Possession with Intent to Distribute a Controlled Substance**

On or about March 16, 2021, in the Southern District of Texas, and elsewhere

**RANDY FARREL KELLY,  
DAVID DEWAYNE GOUGE,**

defendants herein, aided and abetted by others known and unknown to the Grand Jury, did knowingly and unlawfully possess with the intent to distribute a controlled substance. This violation involved 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) and Title 18, United States Code, Section 2.

**COUNT SIX**

**Possession with Intent to Distribute a Controlled Substance**

On or about April 29, 2021, in the Southern District of Texas, and elsewhere

**RANDY FARREL KELLY,  
AARON DAVID ARAUJO,  
CHRISTOPHER JAMAIL PITRE,**

defendants herein, aided and abetted by others known and unknown to the Grand Jury, did knowingly and unlawfully possess with the intent to distribute a controlled substance. This violation involved 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and Title 18, United States Code, Section 2.

**COUNT SEVEN**

**Possession with Intent to Distribute a Controlled Substance**

On or about May 6, 2021, in the Southern District of Texas, and elsewhere

**RANDY FARREL KELLY,  
JASON KEITH DAVIS,**

defendants herein, aided and abetted by others known and unknown to the Grand Jury, did

knowingly and unlawfully possess with the intent to distribute a controlled substance. This violation involved 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and Title 18, United States Code, Section 2.

**Notice of Criminal Forfeiture**

Pursuant to Title 21, United States Code, Section 853, the United States gives notice to defendants:

**RANDY FARREL KELLY,  
AARON DAVID ARAUJO,  
CHRISTOPHER JAMAIL PITRE,  
JAMES ALLEN BYRD,  
ALLEN RAY SNODGRASS,  
RACHEAL NICOLE SPEARS,  
DAVID DEWAYNE GOUGE,  
JASON KEITH DAVIS,**

that, in the event of conviction of an offense in violation of Title 21, United States Code, Sections 841 or 846, the following is subject to forfeiture:

- (1) all property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violation; and
- (2) all property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violations.

**Money Judgment**

Defendants are notified that in the event of conviction, a money judgment may be imposed equal to the total value of the property subject to forfeiture.

**Substitute Assets**

In the event that one or more conditions listed in Title 21, United States Code, Section 853(p) exists, the United States will seek to forfeit any other property of the defendant up to the total value of the property subject to forfeiture.

**A TRUE BILL**

**Original Signature on File**

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FOREPERSON OF THE GRAND JURY**

**JENNIFER B. LOWERY  
UNITED STATES ATTORNEY  
SOUTHERN DISTRICT OF TEXAS**

By: Robert Stabe  
Robert Stabe  
Assistant United States Attorney  
Southern District of Texas  
713-567-9583